

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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JANE DOE 1, individually, and on behalf of all
others similarly situated, JANE DOE 2, individually
and on behalf of all others similarly situated, JANE
DOE 3, individually and on behalf of all others
similarly situated, JANE DOE 4, individually and on
behalf of all others similarly situated, JANE DOE 5,
individually and on behalf of all others similarly
situated, and JANE DOE 6, individually and on
behalf of all others similarly situated,

Plaintiffs,

Civil Action No:
1:23-cv-10301-AS

v.

NOTICE OF MOTION

GOVERNMENT OF THE UNITED STATES
VIRGIN ISLANDS, FIRST LADY CECILE DE
JONGH, GOVERNOR KENNETH MAPP,
SENATOR CELESTINO WHITE, ATTORNEY
GENERAL VINCENT FRAZER, GOVERNOR
JOHN DE JONGH, SENATOR CARLTON DOWE,
DELEGATE STACEY PLASKETT, and JOHN
DOES 1-100,

Defendants.
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PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law dated April 17, 2025, plaintiffs Jane Doe 1, Jane Doe 2, Jane Doe 3, Jane Doe 4, Jane Doe 5, and Jane Doe 6 by and through undersigned counsel, respectfully seeks an Order from this Court at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, for certification and entry of a separate and final judgment on this Court's March 21, 2025 Opinion and Order in this action pursuant to Rule 54(b) of the Federal Rules of Civil Procedure.

Dated: April 17, 2025
New York, New York

Respectfully submitted,

MERSON LAW PLLC

By: /s/ Jordan Merson

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